

RECORDS CLASSIFICATION FORM FOR REGION V
RCRA RECORDS

Today's Date:

12/1/12

Site Name:

ID Number:

Bunting Bearings Corporation
Delta, OH 42159-046

Date(s) of Documents:

3/2/2005

Type(s) of Document:

INV Response

Quantity of Documents: No. of Box(es)

No. of Folder(s):

Sensitive: CBI Room

Enforcement Sensitive (Red Folder)

Documents can go to Federal Record Center: Yes

No

(Documents from FRC can be recalled in 48-72 hours)

Submitted by:

Mike Beedle

Telephone Number:

37922

Comments:

Discard Dup Note



BUNTING BEARINGS CORP.

1001 Holland Park Boulevard • P.O. Box 729 Holland, Ohio 43528-0729 • 419/866-7000 • FAX 419/866-0653

March 2, 2005

Mr. Michael Beedle
Environmental Scientist
USEPA, Region 5
77 West Jackson Boulevard, DRE-9J
Chicago, IL 60604-3590

RE: Certified Letter Regarding Compliance Evaluation

Dear Mr. Beedle:

As a follow up to Mr. Paul Little's letter dated January 11, 2005 and our telephone conversation of Thursday, February 10, 2005 regarding the above-mentioned subject, this letter will serve as our formal response. First and foremost, in our telephone conversation you indicated that the thirty-day (30) deadline for response would be waived.

That being said, in response to the letter, specifically Violation 1, OAC 3745-52-11 (i.e., any person who generates a waste must determine if that waste is hazardous waste), Bunting Bearings LLC again disputes the statement that we are a generator of waste. All baghouse dust generated from baghouses A, B & C are sent to recyclers (and has been for years) for the purpose of filtering out and capturing various types of material, Zinc and Copper to name only a couple. The same would hold true for the graphite cores. They too are sent to a firm that recycles the cores.

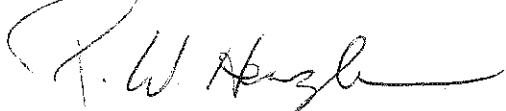
It is our understanding that in accordance with EPA regulations any baghouse dust that is recycled is not classified as hazardous waste. Therefore, Bunting Bearings should not and cannot be classified as a generator of waste. As a result, would not be required to determine if the baghouse dust is considered hazardous waste.

Notwithstanding the above, enclosed you will find a copy of a core sample determination for the graphite baghouse dust.

With regards to Violation 2, OAC 3745-279-22(C) (1), all UST, drums, storing used oil has been marked "Used Oil".

Should there be any questions, I can be reached during normal EST business hours at 419-866-7000.

Sincerely,

A handwritten signature in dark ink, appearing to read "P. W. Henzler, Sr.", with a long, sweeping horizontal stroke at the end.

Phillip W. Henzler, Sr., SPHR
Corporate Manager, Human Resources

cc File



ANALYTICS CORPORATION
8040 VILLA PARK DRIVE, SUITE 250
RICHMOND, VIRGINIA 23228
804-264-7100 PHONE
800-888-8061 PHONE
804-264-8873 FAX
WWW.ANALYTICSCORP.COM

Group No. J041-008
Account No. 34709510
Report Date: 02/15/05

PHILLIP HENZLER
BUNTING BEARINGS CORP.

P O BOX 37
DELTA, OH 43515

**** FINAL REPORT ****

Date Received: 02/10/05 10:37
Sample Type: 1 - Bulk Sample(s)
Project: N/A PO Number: 81968

Lab ID	Parameter	Concentration	PQL	Analysis Analyst	Date/Time
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-001 TOOL & DIE BOGHOUSE Sample Date: 02/07/05

Aluminum	11.7 ug/g	8.00	BLS	02/14/05 18:00
Antimony	< 8.00 ug/g	8.00	BLS	02/14/05 18:00
Beryllium	< 0.40 ug/g	0.40	BLS	02/14/05 18:00
Cadmium	< 4.00 ug/g	4.00	BLS	02/14/05 18:00
Chromium	< 8.00 ug/g	8.00	BLS	02/14/05 18:00
Cobalt	< 8.00 ug/g	8.00	BLS	02/14/05 18:00
Copper	90.6 ug/g	4.00	BLS	02/14/05 18:00
Iron	111 ug/g	8.00	BLS	02/14/05 18:00
Lead	15.6 ug/g	8.00	BLS	02/14/05 18:00
Manganese	< 8.00 ug/g	8.00	BLS	02/14/05 18:00
Molybdenum	< 8.00 ug/g	8.00	BLS	02/14/05 18:00
Nickel	25.1 ug/g	8.00	BLS	02/14/05 18:00
Titanium	9.01 ug/g	8.00	BLS	02/14/05 18:00
Vanadium	33.9 ug/g	8.00	BLS	02/14/05 18:00
Zinc	17.6 ug/g	8.00	BLS	02/14/05 18:00

Report Limit=PQL=Practical Quantitation Limit; DL=Lowest reportable value

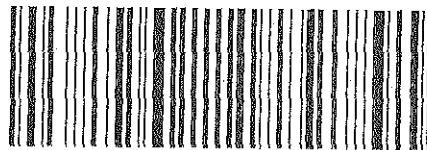
Abbreviations: ug/L = micrograms per liter, mg/L = milligrams per liter,
ug/g = micrograms per gram, mg/kg = milligrams per kilogram, ug/wp = ug/wipe,
ug/ml = micrograms per milliliter, PQL = Practical Quantitation Limit.
uS = microsiemens/centimeter at 25 degrees Celsius, ppb = parts per billion.



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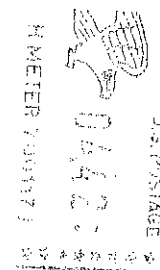
CERTIFIED MAIL™



7003 1680 0002 2806 4511

RETURN RECEIPT REQUESTED

Mr. Michael Beedle
Environmental Scientist
USEPA, Region 5
77 West Jackson Boulevard, DRE-9J
Chicago, IL 60604-3590



60604-3590 10



